

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CYRANO, INC.,  
Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,

QUOTIUM TECHNOLOGIES, S.A.,

and

TECHNOLOGIES, S.A.,  
Defendants.

**CIVIL ACTION NO. 05-CV-11558-DPW**

**ASSENTED-TO EMERGENCY MOTION TO ENLARGE TIME  
IN WHICH TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Quotium Technologies, Inc., Quotium Technologies, S.A., and Technologies, S.A. (together, “Quotium”) move the Court for a short extension of four days in which to answer or otherwise respond to the Complaint of Cyrano, Inc. (“CI”). The current due date is September 19, 2005, Quotium seeks an enlargement to September 23, 2005.

As grounds for this request, Quotium states as follows:

- On July 25, 2005, CI commenced an action in this Court against the individual Defendants;
- All three Defendants have been served and intend to file a joint response to the Complaint;
- Quotium’s counsel is a four attorney firm that has been unable to fully direct its attention to drafting the joint response because it has been preparing lengthy papers, including an affidavit of damages, in connection with three motions in a related action between the same parties; and
- CI’s counsel has agreed to the enlargement sought here.

WHEREFORE, for all of the foregoing reasons, Quotium requests that the Court grant a short enlargement to September 23, 2005 for the filing of its joint response to the Complaint.

Respectfully submitted,

DATED: September 16, 2005

QUOTIUM TECHNOLOGIES, INC., and  
TECHNOLOGIES, S.A.  
QUOTIUM TECHNOLOGIES, S.A.,  
By their attorneys,

/s/ Kevin J. O'Connor

Kevin J. O'Connor (BBO# 555250)  
Mayeti Gametchu (BBO# 647787)  
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**Local Rule 7.1 Certificate Of Compliance**

I hereby certify that on September 16, 2005, I conferred by telephone with Michael Sugrue, counsel of record for Plaintiff Cyrano, Inc., in a good faith attempt to resolve or narrow the issues and that Attorney Sugrue, on behalf of the Plaintiff, assented to the extension sought in this motion.

/s/ Kevin J. O'Connor

Kevin J. O'Connor

**Certificate of Service**

I hereby certify that on September 16, 2005, a copy of the foregoing motion was served by first class mail, post paid, on Michael Sugrue, counsel of record for the Defendant Cyrano, Inc.

/s/ Kevin J. O'Connor

Kevin J. O'Connor